

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Reading Division

IN RE:
LISA KOCHER

Case No. 22-11639-pmm
Chapter 13

Santander Bank, N.A.,
Movant

vs.

LISA KOCHER,
Debtor

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Santander Bank, N.A. ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 7), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on June 23, 2022.
2. Movant holds a security interest in the Debtor's real property located at 268 Colorado Dr, Birdsboro, PA 19508 (the "Property"), by virtue of a Mortgage which is recorded in Official Records of Berks County, Pennsylvania. Said Mortgage secures a Note in the amount of \$275,000.00.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on June 27, 2022 (Doc 7).
4. The proposed Chapter 13 Plan lists Movant in Part 4 (f) Loan Modification section.
5. Movant is in the process of drafting and filing a Proof of Claim in which the Pre-Petition arrears are \$110,738.08.

6. Movant objects to the confirmation of the Debtor's proposed Chapter 13 Plan as the loan modification provision is speculative in nature. Given the large pre-petition delinquency Movant objects to the confirmation of the Chapter 13 Plan when the cure is unfeasible.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor's Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

LISA KOCHER
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Brenna Hope Mendelsohn, Debtor's
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July 5, 2022

/s/Andrew Spivack

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